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U.S. DISTRICT COURT E.D.N.Y.

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Your Honor

I have finished writing the objections to the report, both to the conclusion and to guideline calculation but the only part that I was able to type to Mr. Singer is the objections to calculations. I didn't have a chance to type the objections to the conclusion because all the money that Mr. Singer put on my account have been taken immediately by Brooklyn court to pay the fee for the lawsuit that I have. I didn't know they would take the money.

So I don't know either or not you received my objections. There is also a video testimony that my mother and my daughter have recorded, it just came up. I don't know if you have it. I based my objections on a number of sexual exploitation cases, in particular I brought to the court's attention cases of three different women who I personally know and who were prosecuted here in the Eastern District for sexual exploitation crime as a result of their relationship with the predator man, a former police officer Alberto Randazzo. Mrs. Keira Norton, Mrs. Jenny Lemay and Mrs. Leigh Marcini. Mr. Singer was representing Mrs. Norton.

I paid attention of the court to the case of Mrs. Marcini where she plead to conspiracy sexually exploit a child 18 USC § 2251(e), the same plea that was offered by the government last year to me. The disposition of their case

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60 months imprisonment because she has been provided with the H1 letter from the government. And I assume that she provided some sort of cooperation however she was not a person who initially reported Mr. Randazzo it was another lady, Mrs. Marcin only cooperated after her arrest.

So I have indicated in my objections that there is a clear unfairness in the way how US government is treating me compared to the other ladies who committed similar offense. This unfairness has been consistently communicated to me by already a second defense attorney....

The amount of cooperation that I have provided to American government against Mr. Valerio is tremendous. The criminal complaint and an arrest warrant issued against Valerio has been obtained solely on the information provided by me to agent Angelini in kind with whom I entered into an oral cooperation agreement.

Furthermore I testified at Valerio's hearing as a government witness with the regard to the rape suffered by me at Valerio's residence, the court and already the Second Circuit credited my testimony because Mr. Valerio appealed and he was trying to discredit it.

The fact that the US government has credited Mrs. Marcin's cooperation and is refusing to do so for me despite of the fact that they totally relied on my testimony tells me

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that US government is acting in a bad faith towards me. The government agent Angelini in his emails to me acknowledged my "substantial assistance to them" multiple times and told me how grateful he was for all the info that I provided. Government agent Trowl and even the district attorney Annet Kaborwala have acknowledged by themselves in the year of 2016 that they "don't dispute the amount of cooperation that I provided was significant" and truthful. Their statements can be retrieved from March 2016 hearings.

So based on Second Circuit decision in United States v. John Doe 586 Fed Appx 58; 2014 US App

where the appellate court directed a district court to conduct a hearing on whether the government had acted in bad faith in refusing to make motion seeking downward departure from mandatory min on defendants behalf pursuant to 18 USC § 3553(c) and USSC § 5K1.1 because defendant made requisite showing to rebut governments neutral explanation.

I request my attorney to proceed with this motion. A motion to compel the government to file KI letter.



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There are two other cases that I wanted to draw the court's attention to:

VS v Poluzzi 564 F 3d 142; Jan 8, 2009

Defendant was convicted as a result of trial for possession and receipt of child porn in violation of 18 VSC § 2252(a)(2), § 2252(a)(4)(B), a charge that carried 5 years mandatory min. He has been sentenced by Judge Weinstein to one year and one day in prison.

The government has been represented by Allen Poole where Mr. Poole has charged Poluzzi with 12 counts of receipt and 11 counts of possession of images that have been overturned by Second Circuit into a single violation of 18 VSCS § 2252(a)(4)(B) instead of 12 separate convictions.

VS v Pabon-Cruz 381 F 3d 86; 2004 VS App Dec 3, 2004

Where the Second Circuit remanded the case for resentencing defendant who was convicted under 18 VSCS § 2251(c)(1)(A) for advertising and distribution of child porn 18 VSCS § 2252 A.

The Second Circuit, we consider nostra sponte though the issue was not raised by counsel, nor addressed by district court the statutory penalty provision of 18 VSC § 2251(d) mandates a minimum ten year term of imprisonment."

Contrary to the government's arguments, however, we do not find the other clauses in

the paragraph to be irrefutable proof of Congress' intent to ensure mandatory min. sentences for all offenders without exception; the discrepancy could as easily suggest Congress' intent to allow a more lenient sentence for first-time offenders.

So the bare analysis of the cases of other ladies who committed similar offense out of the relationship with the predator man tells me that US government is acting in bad faith towards me and does treat me unfair compared to other women.

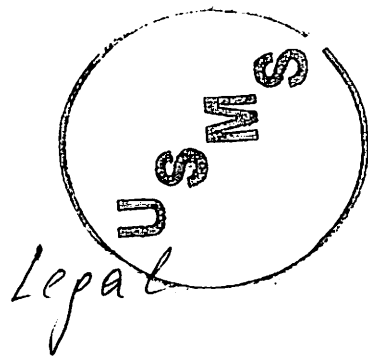
The fact that I acknowledged my mistakes and keep asking God for forgiveness of the sin of sexual immorality that I committed I have described on 50 pages of my objections to the conclusion that I intended to type and present to the court.

With respect  
Olana Kalichunko

August 5<sup>th</sup> 2018

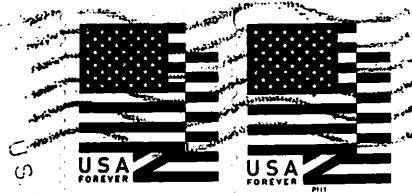


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LONG ISLAND JUDGE

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